

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

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**BROWNSON,**

Plaintiff,

v.

**THE PENNSYLVANIA STATE  
UNIVERSITY,**

Defendant.

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Case No. 4:21-CV-1993

**STIPULATION AND [PROPOSED]  
ORDER AMENDING SCHEDULING ORDER AND FILING DEADLINES**

WHEREAS, Plaintiff filed her Complaint on July 5, 2021, in the Eastern District of Pennsylvania and the parties thereafter, on November 11, 2021, filed a stipulation to transfer venue to the Middle District of Pennsylvania (Dkt. 6) that the Court granted on November 22, 2021 (Dkt. 7);

WHEREAS, on February 11, 2022, the Court entered a Scheduling Order setting a fact discovery deadline of July 1, 2022, and a dispositive motion deadline of August 1, 2022 (Dkt. 20);

WHEREAS, the Court granted the University's unopposed motion to extend the deadlines for fact discovery to September 29, 2022, and dispositive motions to October 31, 2022;

WHEREAS, the Court subsequently granted four joint stipulations and proposed orders (Dkt. 37, 39, 47, 52) to extend certain deadlines, setting the current deadlines as follows: February 10, 2023, close of fact discovery; April 18, 2023, expert reports are due from Defendant; May 2, 2023, the close of expert discovery; and June 19, 2023, the date for dispositive motions;

WHEREAS, while discovery has been ongoing, the Court granted the Plaintiff's motion for leave to file a First Amended Complaint (Dkt. 39), the University moved to partially dismiss the First Amended Complaint (Dkt. 42, 45), and briefing on same closed on January 27, 2023;

WHEREAS, Plaintiff has noticed the deposition of a fact witness, who has been unavailable within the fact discovery deadline due to a family emergency;

WHEREAS, the parties agree that the unavailability of the remaining fact witness warrants an additional twenty-one (21) day extension of the fact discovery deadline;

WHEREAS, the parties also have determined that the interests of judicial efficiency would be served by this Court extending the deadline for each of the following by twenty-one (21) days to mirror the extension of the fact discovery deadline: (1) Defendant's production of expert reports, (2) the close of expert discovery, and (3) the deadline for filing dispositive motions in this litigation; and

WHEREAS, the Court's adoption of the schedule proposed herein will not impose a hardship on any party, and will not impact any trial date, as no such date has been set.

NOW, THEREFORE, the parties stipulate and request approval of the following schedule:

<b>Event</b>	<b>Date</b>
Close of Fact Discovery	March 3, 2023
Expert Reports Due from Defendant	May 9, 2023
Close of Expert Discovery	May 23, 2023
Dispositive Motions	July 10, 2023

**SAUL EWING LLP**

/s/ Carolyn A. Pellegrini

James A. Keller, Esq., PA 78955  
215-972-1964

*james.keller@saul.com*

Carolyn A. Pellegrini, Esq., PA 307026  
215-972-7121

*carolyn.pellegrini@saul.com*

1500 Market Street, 38<sup>th</sup> Floor  
Philadelphia, PA 19102

*Counsel for Defendant*

Dated: February 8, 2023

**FREUNDLICH & LITTMAN,  
LLC**

/s/ Justin F. Robinette

Justin F. Robinette  
1425 Walnut Street, Suite 200

Philadelphia, PA 19102

*justin@fandllaw.com*

Julie Chovanes

Chovanes Law

P.O. Box 4307

Philadelphia, PA 19118

*jchovanes@chovanes.com*

*Counsel for Plaintiff*

SO ORDERED this 8<sup>th</sup> day of February, 2023.



Hon. Malachy E. Mannion, U.S.D.J.